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[Signature]

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

JASON TRAVIS STEVENS,	:	
Plaintiff	:	Civil No. 1:CV-01-0907
	:	
v.	:	(Judge Kane)
	:	
KATHLEEN M. LAWK-SAWYER, <u>et al.</u> ,	:	
Defendants	:	

FILED
HARRISBURG
SEP 20 2001
MARY E. D'ANDREA, CLERK
Per. [Signature] DEPUTY CLERK

MOTION FOR ENLARGEMENT OF TIME

Pursuant to Fed. R. Civ. P. 6(b), defendants request this Court to grant them an enlargement of time in which to file an answer to the complaint. Defendants state the following in support thereof:

1. Plaintiff Jason Travis Stevens is an inmate currently incarcerated at the Federal Medical Center in Springfield, Missouri.

2. On May 23, 2001, Stevens filed a Bivens¹ complaint against the director of the Federal Bureau of Prisons ("BOP") and six BOP employees at the Allenwood United States Penitentiary at

¹ Bivens v. Six Unknown Agents of the Federal Bureau of Narcotics, 403 U.S. 388 (1971).

White Deer, Pennsylvania ("USP Allenwood"), claiming deliberate indifference with regard to Stevens' safety and inhumane conditions of confinement. (Complaint, pp.11).

3. On July 19, 2001, a summons was issued and defendants were ordered to answer the complaint on or before October 1, 2001.

4. Stevens' claims are appropriately addressed by the Bureau of Prisons. Accordingly, in order to properly respond to Stevens' allegations, the United States Attorney's Office has requested assistance from legal counsel at USP Allenwood.

5. Legal counsel at USP Allenwood has informed undersigned counsel that, due to a heavy backlog of legal cases and his current involvement in discovery and trial preparation in other litigation, he is unable to provide a report to undersigned counsel before October 1, 2001.

6. Thus, on behalf of defendants, the undersigned requests an enlargement of time of 14 days within which to answer Stevens' complaint.

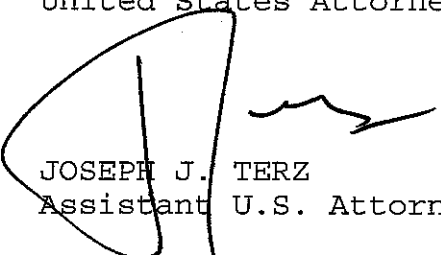
7. Stevens will not be unduly prejudiced by this requested enlargement of time.

WHEREFORE, on behalf of defendants, the undersigned requests a 14-day enlargement of time until October 15, 2001, in which to answer Stevens' complaint. Counsel certifies that he has

not sought Stevens' concurrence because Stevens is a prisoner proceeding pro se. M.D. Pa. Local Rule 7.1.

Respectfully submitted,

MARTIN C. CARLSON
United States Attorney



JOSEPH J. TERZ
Assistant U.S. Attorney

ANITA L. LIGHTNER
Paralegal Specialist
228 Walnut Street, 2nd Floor
P.O. Box 11754
Harrisburg, PA 17108-1754
(717) 221-4482

Date: September 20, 2001

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MIDDLE DISTRICT OF PENNSYLVANIA

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Plaintiff	:	Civil No. 1:CV-01-0907
	:	
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	:	
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CERTIFICATE OF SERVICE BY MAIL

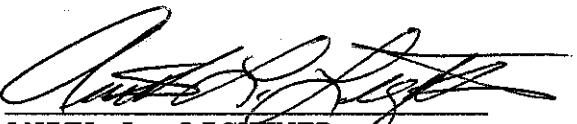
The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers.

That on September 20, 2001, she served a copy of the attached

MOTION FOR ENLARGEMENT OF TIME

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Harrisburg, Pennsylvania.
Addressee:

Jason Travis Stevens
Reg. No. 10182-036
FMC Springfield
P.O. Box 4000
Springfield, MO 65808


ANITA L. LIGHTNER
Paralegal Specialist